

## **Exhibit H**

**Michael Dennis Goggin**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
MICHAEL DENNIS GOGGIN**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK      )  
                              : SS.:  
COUNTY OF NASSAU      )

MICHAEL DENNIS GOGGIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 671 Adonia Street, Franklin Square, New York 11010.
2. I am currently 40 years old, having been born on November 20, 1981.
3. I am the son of John Edward Goggin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from pancreatic cancer on May 6, 2008, at the age of 53. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My father was a loving, caring, and supportive dad. He wanted me to start in sports early on. I started out young. At about eleven or twelve years old, I began boxing. Then, when we moved to Long Island, I got into football, baseball, and wrestling. He came to all of my events. He was always there for my awards ceremonies and martial arts classes and would take me out for surprise lunches and ice cream. He gave me the best advice in the world. Had I

gotten married when my dad was still alive, he would have been my best man. He was more than a father; he was my best friend.

6. My father was a Detective for the NYPD. He responded immediately to the World Trade Center when the towers collapsed. He's a hero in my eyes—he sacrificed his life for the NYPD. He was a true patriot. He did a lot of work down there, and, through the years, he started to develop a chronic cough. He was diagnosed with bronchitis.

7. His lifestyle in the last few months of his life changed significantly. He was quiet about it, but you could notice that he wasn't himself. He was a very proud police officer and detective, proud of his heritage, and of the life he had made for himself. I asked if he was alright, but he told me everything was fine. I had a hunch that it was related to what happened to him at Ground Zero. I knew that I was losing him bit by bit to his 9/11-related illnesses.

8. I learned about my father's pancreatic cancer maybe a month before his death. He deteriorated very quickly. He got so depressed about it. His emotions changed. If I asked him a question, he would be snappy. He didn't want to be bothered. He never wanted his children or his wife to know anything, because he felt like he could do it on his own. The physical changes he went through were very shocking—he had jaundice, was losing weight, and his skin sagged. I was there with him the day he passed away. He was too young to die. There was a lot more life left in him.

9. My father's death affected our family financially. My father was the provider of the family. He was always working and taking overtime. He always paid the bills and the mortgage on time. We didn't think that our one source of income as a family was going to be gone. When my father died, my mom would get calls from the bill collectors. It was really hard on my mother. I had to be strong for her. I was a 26-year-old man, and I had to step up, even though I was young. I helped support our family financially. If I had to skip a meal so that my brother, sister, and mother could eat, I would do that.

10. My father's death also impacted me emotionally. I became anti-social, and I started drinking heavily and smoking cigarettes. While I don't do that anymore, at the time I was just looking for answers. I had given up on hope in life. Every year on the anniversary of his death, it still hurts. I never want anyone to go through that pain and suffering in their life.

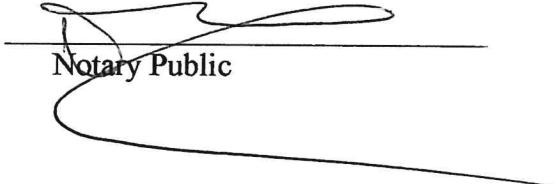
11. My sister was only sixteen years old, and my brother was eight, when our father died. My little brother wanted to know why our father died. It's hard, as a twenty-six-year-old, to tell your eight-year-old brother why his father is dead. It hurt me to tell him probably even more than it hurt my brother to receive that information. I tried my best to raise my brother after our father's death. I teach him the things that our dad taught me. He'll never have a father in his life. My brother and sister deserve to have a father in their life. No son or daughter should ever have to go through what our family went through.

12. I'm very angry with what these people did to our country, and to our father. I don't understand why they attacked us. So many families were hurt. It's a very sad thing, and I hope that someone pays for this. It's very hard for me to take in.



MICHAEL DENNIS GOGGIN

Sworn to before me this  
14 day of July, 2022

  
Notary Public

MICHAEL FRANCIS SEIP  
NOTARY PUBLIC - STATE OF NEW YORK  
No. 01SE6423336  
Qualified in Nassau County  
Commission Expires 10/12/2025

**Tara Katelyn Goggin**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
TARA KATELYN GOGGIN**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK      )  
                              : SS.:  
COUNTY OF NASSAU      )

TARA KATELYN GOGGIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 312 Clinton Street, Bellmore, New York 11710.

2. I am currently 31 years old, having been born on December 11, 1990.

3. I am the daughter of John Edward Goggin, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pancreatic cancer on May 6, 2008, at the age of 53. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and I grew up very close. When you grow up, your dad is your first love. He would always take me out shopping and to restaurants. We did a lot of family vacations. He was a father that was always spending time with his children. I would go to him for advice. He was my protector. In high school, I was very interested in cosmetology, and my

dad supported me.

6. My father was a Detective for the NYPD. He was down at the World Trade Center for several weeks after the 9/11 attacks, cleaning up. He was a very popular detective, and he was loved by his coworkers. He helped to clear debris from the pile. He was a hero in my eyes.

7. When my dad first became ill several years after 9/11, he started to lose weight. As soon as he started to feel sick, I noticed that something was different. It was probably months prior to his passing. His skin was pale, he just didn't look good. At one point, they thought it was a hernia. But he was diagnosed with pancreatic cancer, and two weeks later he was gone. But he didn't want to talk about it or put the burden on his children, because he had young kids. I was only seventeen, and my younger brother was basically just a baby. He became very emotional and had a lot of anger.

8. It was heartbreaking to see my dad receive hospice care. Even though they took good care of him, giving him his medications on time, it was still traumatizing to watch my father deteriorate. I was able to speak with him a little bit before he passed away, while he was still able to speak.

9. My father's illness and passing caused an extreme emotional impact on my life. I was always a nervous wreck after he died, and I started to experience anxiety. I was nervous that terrorists would come to attack the city again, or that my mom would fall ill, and I'd be left without a parent. My dad was my protector, and when he died, I was left without one. I was only 17 years old when my father passed away. I would also think; my dad will never be here to walk me down the aisle. If I have kids, they won't have a grandfather.

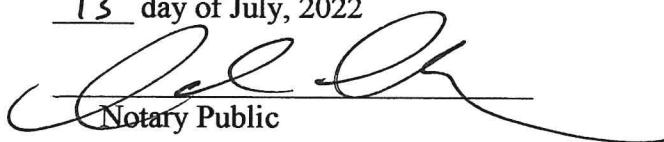
10. Financially, my father was always there for us. It would stress me out to think about my mother, a single working parent, trying to keep the house heated and food on the table. It was scary.

11. We would go to the 9/11 memorials every year before the COVID-19 pandemic. I found some comfort in that, because the NYPD treats you like family. We would have lunch with the police force, go to 1 Police Plaza, and then we would do a memorial ceremony. I felt like it was keeping my dad's memory alive.

12. My father was very loved. He would be the person to walk me down the aisle, he was my first love in life. He was my hero. He was a very well-loved detective and a good person. I miss him every day.

*Tara Katelyn Goggin*  
~~Tara Katelyn Goggin~~  
TARA KATELYN GOGGIN

Sworn to before me this  
13 day of July, 2022

  
Notary Public

**CAROLINE CHRISTIAN**  
Notary Public state of New York  
No.01CH6424565  
Qualified in Nassau County  
My Commission Expires 11/01/20~~25~~

**Bridget Elizabeth Gormley**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

GEORGIA M. ASCIUTTO, et al.,

-----X  
**AFFIDAVIT OF  
BRIDGET ELIZABETH GORMLEY**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )  
: SS.:  
COUNTY OF NEW YORK )

BRIDGET ELIZABETH GORMLEY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1954 1<sup>st</sup> Avenue, Apt 11P, New York, New York 10029.

2. I am currently 31 years old, having been born on February 16, 1991.

3. I am the daughter of William John Gormley, Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from bladder cancer on June 14, 2017, at the age of 53. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. He was my father in every sense of the word. He was a very hands-on parent from the day I was born until the day he died. As a fireman, he worked unusual hours. He didn't work a typical nine-to-five job. So, I was able to spend more time with him. I probably got to spend more time with my dad than the average kid. We would go on adventures together, and we would go fishing with my brothers. He taught me how to ride a bike. He moved me into and out

of every apartment I ever had, and he moved me into and out of college. Even when I was in college and beyond those years, I spoke with my dad on the phone every day. I did a stint in Europe, and he called me every day, trying to convince me to come home. He didn't like me being so far away. Just before his bladder cancer diagnosis, which was right after I returned from Europe, I was living at home for about seven months because I couldn't find a job. He and I were together every day during that period of time.

6. On September 11, 2001, my dad was an active member of the FDNY and was working in Brooklyn at the time. As soon as he heard about the terrorist attacks, he went down to Ground Zero and was there before the towers collapsed. In the weeks and months that followed, my dad worked to help any way he could in the recovery efforts to support his fellow firefighters and civilians.

7. My dad was diagnosed with bladder cancer during the holiday season in 2016, right around Christmas. My mom broke the news to me before she told my younger brothers, just because of the age gap. So, I had to grapple with that news for a little bit longer than they did. My dad didn't want to tell me directly because he had a hard time absorbing the news himself. But eventually he told my brothers.

8. He went through chemotherapy and radiation, which lasted from February 2017 until May 2017. Those treatments were very, very hard for him. He had zero energy, didn't eat, and slept the majority of the day. He became very weak. During the chemotherapy, he accepted the offer for FDNY Family Transport, a free service which transports sick FDNY members to and from hospitals for cancer treatments. If he didn't accept the Family Transport, I don't think he would've been physically able to drive himself to the hospital—that's how weakened he had become.

9. After his treatment ended in May 2017, my dad was alright for about a week before things really started going downhill. We learned that the bladder cancer had spread to his lungs. I was working freelance in California at that time. My brother called me and said, "You have to come home. Dad isn't doing well." I came home on June 8<sup>th</sup>, 2017. He passed away from the cancer six days later. That's when I became not only a grieving daughter, but a husband and a father for my family.

10. My dad's death brought my immediate family closer, as we all needed to support

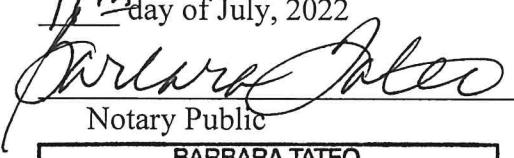
each other. We held each other up. My father's death ushered in a "changing of the guard" for my brothers and me, as we all had to step up and become more responsible adults. I spent a lot of time dealing with my father's personal affairs (e.g., funeral, estate, etc.) and in mourning after his death, which impacted my ability to work freelance. My three brothers were also freshmen in college, and I spent a lot of time supporting them so that they could have a "normal" college experience. I wanted to make sure that my brothers continued to go back to school and got good grades. When my dad started to become extremely sick, I realized that I had to fill the place he was going to leave behind. When he died, I picked up the torch that he left in his absence.

11. I miss my dad every day. His death was a huge loss for me, my family, and society.



BRIDGET ELIZABETH GORMLEY

Sworn to before me this  
11<sup>th</sup> day of July, 2022



Barbara Tateo  
Notary Public

BARBARA TATEO NOTARY PUBLIC, STATE OF NEW YORK Registration No. 01TA4962776 Qualified in New York County Commission Expires June 17, 2026
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**Kevin Michael Gromley**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
KEVIN MICHAEL GORMLEY**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X

STATE OF NEW YORK )  
: SS.:  
COUNTY OF NEW YORK )

KEVIN MICHAEL GORMLEY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1954 1<sup>st</sup> Avenue, Apt. 11P, New York, New York 10029.

2. I am currently 23 years old, having been born on August 20, 1998.

3. I am the son of William John Gormley, Sr. upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from bladder cancer on June 14, 2017, at the age of 53. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My father and I were extremely close. I'm one of a set of triplets, and we were his boys growing up. Sometimes, dad would take us around the firehouse where he worked and introduce us to his friends and fellow firefighters, to show us what he did day to day. In

addition, at a young age, we moved to Vermont, a very outdoor-oriented state, which was nice because it gave us a chance to spend a lot of time together. Dad would take us fishing, kayaking, hunting, and hiking. Whatever it may have been, dad wanted to include us in it so that we could have the best time possible in a whole new environment. Remarkably, he was also a football coach and would attend all of our sporting events, no matter where it was, to show us his support. He was just a very funny, happy guy, who was great to be around. My dad had an energy that really had a positive impact on others because he really liked talking to people. Since this cuts both ways, I think a lot of people also enjoyed being around him. I loved my dad and looked up to him as someone I should emulate when I'm older based on his positive outlook on life.

6. My dad gave me a lot of critical fatherly advice growing up. He always encouraged my brothers and me to give everything 100%, explaining that life's tough but no matter what, you need to go about your life in a positive way. He also reminded us that no matter what the job is or where, to work as hard as you can. Dad taught us to give others the benefit of the doubt, saying that you should always be as nice as you can to everyone because you don't know what anyone else is going through at a particular moment. Ultimately, dad imparted many life lessons, to which I attribute making my siblings and me really stand-up people.

7. At the time of September 11, 2001, my father was working with the FDNY as a firefighter out of an East Flatbush, Brooklyn firehouse. He responded on the day of the 9/11 attacks and then spent months down at Ground Zero. My dad helped with the cleanup and recovery efforts, fought fires, and made sure that he did whatever he could do to assist at Ground Zero. My father told us some stories about 9/11 when we were growing up; however, for the most part, he wanted to protect us from some of the more disturbing details from the attack and what he observed in the course of his work at Ground Zero. As a fireman, he saw some pretty messed up stuff, including coming across body parts laying around the World Trade Center. A lot of my dad's work at Ground Zero was really quite emotional for him. You would never think something like 9/11 could ever happen, and no one can ever be fully prepared to experience it.

8. Unfortunately, my father experienced health problems even from the time my brothers and I were in primary school. It was something that just became accepted as the norm. My dad tried to make it so his health issues were not too obvious to his children. However, as his illnesses worsened over time, they became impossible to hide. The reality is that, for us to be part of his life, we would go to doctors' appointments all the time growing up. On the bright side, we'd go out afterward, and he'd plan fun activities following the doctor. This just became the norm. My first experience seeing my dad in real pain was in 2004, after he needed mitral valve surgery on his heart. It's not something you want to see because, at such a young age, you tend to think of your father as invincible. From there, around the time we were in middle school, my dad was on kidney dialysis and had to undergo kidney transplant surgery. This was another scary procedure that was tough on him. I remember seeing him in pain, but he still tried to appear as normal as possible. Even during those tough times, my dad still managed to brighten our days and crack jokes like he normally would.

9. When he started to become really sick, it was hard to see him in so much pain knowing that he had been such a happy person when we were growing up. At that point, he was battling cancer, and you can clearly notice the difference in his health, could see he lost weight and experienced a lot of fatigue. I found out about my dad's cancer diagnosis while I was in my first semester of college when my sister reached out to my brothers and me to let us know. This was the last type of thing I wanted to hear and began to think about the worst-case scenario. I was hoping for the best, but it really took a toll on me mentally. As a result of the news, I received about my dad, it was difficult to focus on school and maintain a balance academically and socially, while also staying abreast of my dad's condition and doing anything I could to help out the family. Hearing about updates regarding my dad's cancer care was really painful because I started to realize he wouldn't be around to see me graduate from college. That was rough because it was something that would have brought him a lot of joy. My brothers and I all felt this way because we understood he wanted us to go to college because never had the same opportunity.

10. Toward the end of my freshman year of college, I could see my dad's condition deteriorated to the point where he was a totally different person. He came to help my brothers and me move out of our dorm but was so weak. It was very difficult for him to even leave the

car, let alone carry some of the smaller boxes. Shortly after we returned home to Vermont, dad had to be hospitalized at Sloan Kettering in New York. I received a phone call indicating that he probably wasn't going to be able to make it home. Everything went downhill pretty fast from there. My dad became even more fatigued and lost a lot more weight. He spent the last week or two of his life in hospice care in the Bronx, where he passed away. Just seeing my dad in his weakened state and the conditions at the hospice, I remember thinking to myself, he deserves more than this.

11. Since I lost my father when I was only 18, I'm reminded of his loss on a regular basis. I was still young when my dad passed away and with so much more life left to live, there's still lots of life lessons left to learn, which I won't have the opportunity to receive from my dad. He was a very handy man and would always show us tricks on how to make home repairs. I think about my dad when I'm fixing something at home, and I'm sad that he's no longer here to teach me even more. It was great having him teach us all those things as kids, but, as a young adult, I'm finding that I wish he were still here to guide me on more complex questions as I continue to make my way through the world. Ultimately, sometimes it's important to have someone there to talk to man-to-man, and not having my dad here for that is extremely tough. I feel robbed in the sense that dad wasn't even able to see me graduate from college, get my first real job out of school, and everything else that comes down the line. More importantly, sometime in the near future, when I start my own family, I know my dad would have wanted to be there so he could share in that experience. I'm sad that he's unable to be a grandfather when I have children of my own.

12. My parents were married for over 20 years and were extremely close. After my dad passed away, my siblings and I became worried about my mother being up in Vermont in this big house all by herself. My brothers and I continued school at SUNY Cortland, and my sister was finding her own path down in Manhattan. With all of us in different places, we worried about each other, my mother in particular. My dad's illness and passing away created a number of constraints financially. The cost of his medical bills combined with college tuition for three children created a substantial burden on my mother. As a result of some of these tough times, my siblings and I felt as though we have to step it up, keep moving forward, try to live the happiest life we could, and do whatever we could to support each other financially as well as

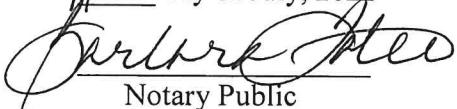
emotionally. I'm grateful that we're all still close and there for each other every day.

13. After my father's passing, I realized that life's never going to be the same. In my experience, growing up without a father figure is really tough. This is especially true, knowing how rough it is to see my peers who are able to have the experience of sharing their families with their fathers. It takes a toll on me emotionally every day.



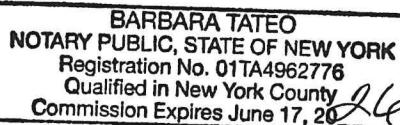
KEVIN MICHAEL GORMLEY

Sworn to before me this  
14<sup>th</sup> day of July, 2022



Barbara Tatoe

Notary Public



**Lizanne Gromley**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
LIZANNE GORMLEY**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF VERMONT      )  
                              : SS.:  
COUNTY OF RUTLAND      )

LIZANNE GORMLEY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 161 Quarry Road, Danby, Vermont 05739.

2. I am currently 56 years old, having been born on October 31, 1965.

3. I am the wife of William John Gormley, Sr., upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from metastatic bladder cancer on June 14, 2017, at the age of 53. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Our lives revolved around each other and our family, even when we were quite young. I first met William while we were in high school together and then became a couple when I was 19 and he was 20. We raised our children as best we could and worked hard to give them good educations as well as keep them entertained. My husband worked a lot. In addition to being a fireman with the FDNY, William had various second jobs. As a result, whenever we

were together, spending time with family took priority. William took on a number of home improvement jobs to provide for us, including roofing, siding, and concrete work. In 2002, I took the kids to Vermont for the summer and, essentially, moved up there and never came back. My husband continued to work for the FDNY until around 2006, when he had to retire for health reasons. When William was still on the job, he would continue to go back and forth to work from Vermont.

6. On September 11, 2001, William was working at the firehouse. In fact, I remember driving him to work that morning. When I left him, the buildings were still collapsing, and I remember Two World Trade was still coming down. From there, it was at least another 24 hours until I saw my husband again. When he returned home, it was as if he came back a totally different person with a different mindset. He slept for about ten hours and then went right back to Ground Zero. William was working with the fire department on search and rescue efforts, which later turned into search and recovery, attempting to locate remains to assist in identifying victims. William continued this work around the World Trade Center for a few months after 9/11.

7. After working at Ground Zero, William started to cough immediately and never lost the cough until the day he died. He constantly needed to clear his throat. This made sleeping virtually impossible, as William would wake up in the middle of the night trying to clear his throat. All of William's health issues, mentally and physically, started after his work on 9/11. In 2004, William needed heart surgery. From there, he would later develop problems with his kidney and pancreas. When my sons were beginning their freshman year of college in 2015, William was diagnosed with bladder cancer. After he was diagnosed, the doctors tried to attack it fast and hard, prescribing both chemotherapy and radiation. Unfortunately, while we thought he may be recovering from the bladder cancer after the treatments, we discovered that William now had Stage IV lung cancer, which ultimately killed him. Before William passed away, he was in Sloan Kettering for about four days before being transferred to hospice for end-of-life care, for approximately five days.

8. Emotionally, navigating all of my husband's medical conditions over the years was extremely traumatic. Already, before receiving any news about cancer, William needed heart surgery in 2004. Unfortunately, after the surgery, his kidneys started to fail. Later, following dialysis treatments, William needed a kidney transplant and was fortunate to receive a

donor organ relatively quickly. Like a domino effect, it was always one thing after another. This was very stressful because, whenever we thought we had a handle on things, something else would hit. After getting past the kidney transplant, the next thing we had to deal with was skin cancer, which required a nerve-racking series of appointments and treatments. Life became much more complicated, as William was no longer able to work the second jobs that he did before. It was also stressful to try to keep things in balance, manage his health while still keeping things as normal as possible for the kids. I experienced a lot of pain watching my husband change in terms of his attitude and mental health. Of course, he was always a kind and gentle person but, after becoming ill, he had a tendency to become angry and frustrated working through what was happening to him. Sometimes, William would speak with one of the fire department psychologists, though he generally didn't want to accept their help. This was a lot for me to handle, as I had to balance taking care of my husband, making him comfortable, and still keeping the family together and making things as normal as possible for our kids.

9. Once William started to have health problems and was unable to work, there was a strain on the family financially. In order to hold things together, I had to take on small cash jobs with friends, sometimes in the hospitality business. Sometimes, it was a real stretch to take care of three boys who all played sports at the time. As a result, I had to buy everything in pairs of three, three pairs of cleats, three lacrosse sticks, three clubs, etc. Ultimately, I was juggling my various odd jobs, together with chauffeuring the kids to sports practice and their father to his medical appointments. Since Vermont uses single payer health insurance and did not accept William's insurance from the FDNY in New York, we had to receive care in Saratoga Springs or Glens Falls, NY. As a result, this created additional expenses on my credit card associated with traveling over an hour and a half each way for medical treatment. While health insurance covered most things, William's kidney transplant was extremely expensive and put our family in debt for a number of years due to out-of-pocket costs.

10. I feel that the kids were robbed of a lot of different things by not having their father in their lives for a longer time. To an extent, William understood that he didn't have much time left. I recall he made a comment at a graduation party that he wanted to see his children graduate from high school before he passed away. Fortunately, he made their graduation in June and was diagnosed in September. However, I'm saddened that he's not here to see our children continue to grow, start their own families, and accomplish all their dreams.

The devastation caused by 9/11 was unfathomable. The impact it had on my husband's health was something that persisted for years and ultimately was responsible for his loss, which is still felt by his family.



LIZANNE GORMLEY

Sworn to before me this  
18<sup>th</sup> day of July, 2022



Barbara Tateo  
Notary Public

BARBARA TATEO NOTARY PUBLIC, STATE OF NEW YORK Registration No. 01TA4962776 Qualified in New York County Commission Expires June 17, 2026
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**Raymond Joseph Gormley**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re:

TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X  
GEORGIA M. ASCIUTTO, et al.,

**AFFIDAVIT OF  
RAYMOND JOSEPH GORMLEY**

Plaintiffs,

20-CV-00411 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X  
STATE OF NEW YORK )  
: SS.:  
COUNTY OF NEW YORK )

RAYMOND JOSEPH GORMLEY, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 1954 1<sup>st</sup> Avenue, Apt. 11P, New York, New York 10029.

2. I am currently 23 years old, having been born on August 20, 1998.

3. I am the son of William John Gormley, Sr. upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from bladder cancer on June 14, 2017, at the age of 53. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My family and I grew up in Vermont and were part of a community that emphasized outdoor activities. When we were growing up, my father spent a lot of time taking us fishing, hunting, hiking, and exploring lots of other activities that we can do in the mountains. I always appreciated how dad would invite us to participate in errands around the house, so that we could learn how to fix things and complete basic home repair jobs. We had a

really close relationship, and before my dad became ill, we were always out and about doing different things. My dad was always there for us. In fact, since my brothers and I loved sports, my dad would coach our football and baseball teams. Growing up, my father was always sick. It was kind of the norm, whether it was skin cancer, respiratory problems, or kidney dialysis. However, he always managed to sweep it under the rug for us and didn't let on as to the full extent of what was going on. He was a really great dad, and I was heartbroken when he started to become severely ill in around 2016. By that time, he couldn't really hide it anymore, it was too obvious. During the time my dad received chemotherapy and radiation from Sloan Kettering, he could no longer do all the same activities we used to enjoy and didn't see us nearly as much as before. This was particularly difficult because he would come back from treatment exhausted and sometimes even throw up. He became a different person. While my brothers and I still had my dad with us for our freshman year of college, it was definitely difficult to go through the rest of college without a father figure to tell us stories and give us advice.

6. On September 11, 2001, my dad was an active member of the FDNY and was working in Brooklyn at the time. As soon as he heard about the terrorist attacks, he went down to Ground Zero and was there before the towers collapsed. In the weeks and months that followed, my dad worked to help any way he could in the recovery efforts to support his brothers, his fellow firefighters, and anyone else affected by the tragedy. While we were growing up, my dad was pretty reluctant to go into detail about 9/11. He would tell us a little bit on each 9/11 anniversary. Understandably, though, he did not go into too much depth. Being a first responder with the FDNY, my father partook in search and recovery missions, working to locate body parts and remains in order to assist in identifying other victims of 9/11.

7. When my brothers and I were growing up, as far back as I can remember, my dad always had some health problem. As a result, I can remember making many trips with my parents to doctors' appointments. In addition, I remember my dad's pulmonary function was pretty weak, and he had a chronic cough. Unfortunately, as time went on, this really began to limit the extent of physical activities in which my dad could participate. It was impossible not to notice my dad's limitations. You could tell that he needed his moments to step aside, catch his breath, and compose himself, sometimes with extra oxygen. Then, it really progressed when my brothers and I were about 17 years old. Once we started college, my dad was diagnosed with

bladder cancer, and it was quick and aggressive. He was diagnosed in the winter of 2016 and passed away the following June. Over the course of those seven or eight months, my brothers and I were away in college and unfortunately weren't able to visit as often as we would have liked. At one point, I returned home from spring break and visited with my dad after he received one of his chemotherapy treatments at Sloan Kettering, which was very difficult. When I saw him, it was as though he was a completely different person. He used to be a big tough-looking guy. But now he appeared pale and skinny and with no energy.

8. After my mother picked my brothers and me up from college in May 2017 and took us home for the summer, my dad's condition was noticeably worse. At that point, my dad couldn't even walk five steps without struggling to catch his breath and coughing.

9. The time that my father was ill and battling cancer was personally difficult for me on an emotional level. I remember when I first found out about the diagnosis, I was in my dorm at school. My sister told me about it. I was in shock and just started to think about the worst-case scenario. Just hearing about the bad news really affected every aspect of my life at the time. As a result, I was distracted and couldn't really think with a clear head that year, which made me suffer both academically and socially. With racing thoughts about my dad's health, I was always worried, anxious, and depressed. And as time went on, it was like a cascade effect, where the emotional reaction became worse and worse. Had this not happened, my experience in college would have been much different. I faced such extensive social and academic struggles in my freshman year that I really had become a different person compared to the student I was when I first started.

10. At the time that my father passed away, my brothers and I were only 18 years old. It was very stressful to have my dad pass away at such a young age, as I was still in the process of determining how I would support myself, let alone other family members. I was very concerned about my mother who, after having been married for over 20 years, was now alone. While dad was near the end of his life, I began to think about what would happen if he did pass away. Who would be the man of the house per se, take care of finances, maintain the home, and support my mother emotionally? It was a lot to take in all at one time, realizing that my dad was gone and that he had been the glue holding everything together. Dad had taken care of maintaining the home and had always made sure there was food on the table and a roof over our heads. I had some difficult conversations with my brothers, and my sister, about how we would

approach stepping up and taking care of things to make sure that life would continue as smoothly as possible. It was definitely a time replete with pain and anxiety.

11. My dad's health issues and cancer diagnosis had a significant impact on our family's finances. Since my dad was our family's primary source of financial support, his diagnosis and inability to work created a strain on the family budget. This was particularly true since my brothers and I had already enrolled in college. Despite these challenges, my mother made sure that we could continue to stay in school and that our lives would not have to change too much because of our dad. Some of the biggest expenses for my mom included hospital bills as well as transportation costs for treatment between Vermont and New York. While my family was generally careful financially, in case of an emergency, it's virtually impossible to be prepared for expenses resulting from cancer treatment, especially when faced with myriad other large financial obligations such as college tuition.

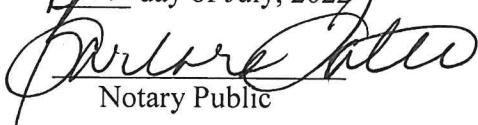
12. While losing a father is tough, and inevitable, for anyone, it's particularly difficult to lose your father when you're only 18 because you're still maturing and learning your way through life. It's a tough time to lose someone. There's a lot you're sweating about yourself. As a young adult, there are a lot of problems you'd wish you had someone to talk to about man-to-man. That was the situation in which I found myself. My dad's not there anymore, and it's impossible to find someone to confide in the way that I could with my father.



RAYMOND JOSEPH GORMLEY

Sworn to before me this

12<sup>th</sup> day of July, 2022



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